

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 13-00165-01-CR-W-DW
)	
JOEL D. WHITE,)	
)	
Defendant.)	

**DEFENDANT’S SUPPLEMENT TO SENTENCING MEMORANDUM:
SUGGESTIONS SUPPORTING DOWNWARD VARIANCE**

COMES NOW the defendant, Joel D. White, by counsel, Travis D. Poindexter, Asst. Federal Defender, in accordance with Rule 32, Fed. R. Crim. P., and hereby submits the following Supplemental information for the Court’s consideration:

Mr. White incorporates by reference, all the information contained in his initial Sentencing Memorandum that was filed on March 18, 2015. (Doc. #42). Mr. White submits that a downward variance to the mandatory minimum 15 years on each count running concurrently is appropriate and warranted in this case.

Supplemental History and Characteristics of Joel White

Mr. White has fully accepted responsibility for his conduct related to the offenses charged. At the time of his arrest, he spoke with investigators and provided a full statement acknowledging his culpability. He then entered pleas of guilty before this Honorable Court to accept responsibility for his actions.

Mr. White has been in custody since his arrest on April 23, 2013. Despite the limited programming available at local detention facilities, Mr. White has been extremely proactive in his

pursuit of atoning for his conduct and making himself a better person. During his time in local custody, Mr. White has sought out and participated in numerous courses. From his participation, Mr. White has earned certificates of achievement. The actual certificates are located in Attachment 1, but in summary form are from the following Groups:

Groups of Certificates

- A. Set Free Prison Ministries – Rehabilitation by Regeneration (17)
- B. Way of Life – Bible Correspondence Course (5)
- C. Rock of Ages Prison Ministry (21)
- D. Prisoners for Christ Outreach Ministries (1)
- E. Exodus Bible Correspondence School (15)
- F. Emmaus Correspondence School (3)
- G. American Bible Academy (1)
- H. The Salvation Army Bible Correspondence Course (1)
- I. World Home Bible League (1)
- J. Gospel Express Evangelistic Team (2)
- K. Good News Jail & Prison Ministry (2)
- L. Truth Chasers Club (3)
- M. Center for Evangelism and Discipleship (9)
- N. Wisconsin Ev. Lutheran Synod (22)
- O. CCA Programs (9)
- P. Certificate of Baptism (1)
- Q. Church of Christ (1)
- R. United Personal Ministries International (1)
- S. Jailhouse Rock Ministries (7)
- T. Crossroad Bible Institute (1)

Mr. White has also received a several Letters of Support which are include in Attachment 2 from the following individuals:

Support Letters

- 1. Cassandra Winburn – Former Employee
- 2. Pastor Stelter - Our Savior Lutheran Church
- 3. Director Walsh - Child Evangelism Fellowship
- 4. Meghan Leigh - Crossroad Bible Institute
- 5. Anne Raphael – Mother
- 6. Mary Raphael – Sister
- 7. Lisa Oliver – Business Reference
- 8. Judy Moling – Family Friend

CONCLUSION

Mr. White fully understands the gravity of the offenses for which he is being sentenced. His actions demonstrate that has reflected on the circumstances that have led him to this point and that he has devoted his personal focus in a productive manner. Mr. White submits that his pursuits also demonstrate that he will not be a risk to reoffend and that he can be a positive member of, and contributor to, the community.

Section 3553(a) directs that a Court shall impose a sentence sufficient, but not greater than necessary as well as evaluate the kinds of sentences available. In this instance, the mandatory minimum sentence of 15 years would satisfy that directive, is well within the Courts discretion, and warranted in this case.

WHEREFORE, Mr. White requests this Court to consider a downward variance from the advisory guidelines and impose a 15-year sentence.

Respectfully submitted,

/s/ Travis D. Poindexter
TRAVIS D. POINDEXTER
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that one copy of the foregoing motion was electronically delivered on the ECF system.

/s/ Travis D. Poindexter
TRAVIS D. POINDEXTER